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19 FIDELITY NATIONAL TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**  
26 **DISTRICT OF NEVADA**

27 HSBC BANK USA, N.A.,  
28 Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC. et al.,  
Defendants.

Case No.: 2:20-CV-01515-JAD-BNW

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO  
OPPOSITIONS TO MOTIONS TO  
DISMISS AND COUNTERMOTION  
FOR PARTIAL SUMMARY  
JUDGMENT (ECF Nos. 32, 33, 35, 36)**

**(FIRST REQUEST)** ECF No. 39

COMES NOW defendant Fidelity National Title Insurance Company ("Fidelity") and plaintiff HSBC Bank USA, N.A. ("HSBC"), by and through their respective attorneys of record, hereby agree and stipulate as follows:

1. On September 15, 2020, Fidelity and fellow defendants Fidelity National Title Group Inc. ("FNTG") and Fidelity National Title Agency of Nevada, Inc. ("Fidelity Agency")

1 filed their motions to dismiss (ECF Nos. 11, 12, 13.);

2           2.       On November 30, 2020, HSBC filed its responses to Fidelity, FNTG, and Fidelity  
3 Agency's motions to dismiss (ECF Nos. 32, 33, 35) and filed a counter-motion for partial  
4 summary judgment (ECF No. 36);

5           3.       Fidelity, FNTG, and Fidelity Agency's deadline to respond to the oppositions to  
6 the motions to dismiss and counter-motion for partial summary judgment is currently December 7,  
7 2020;

8           4.       Fidelity, FNTG, and Fidelity Agency request a brief extension of time to respond  
9 to the various motions, until December 21, 2020, to afford Fidelity, FNTG, and Fidelity Agency  
10 additional time to respond to the legal arguments set forth in HSBC's motions;

11           5.       HSBC does not oppose the requested extension;

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6. This is the first request for an extension which is made in good faith and not for purposes of delay;

**IT IS SO STIPULATED** that Fidelity, FNTG, and Fidelity Agency's deadline to respond to HSBC's oppositions to the motions to dismiss (ECF Nos. 32, 33, 35) and counter-motion for partial summary judgment (ECF No. 36) is hereby extended through and including December 21, 2020.

Dated: December 1, 2020

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
Attorneys for Defendant  
FIDELITY NATIONAL TITLE INSURANCE  
COMPANY

Dated: December 1, 2020

WRIGHT FINLAY & ZAK, LLP

By: /s/-Darren T. Brenner  
DARREN T. BRENNER  
Attorneys for Plaintiff  
HSBC BANK USA, N.A.

**IT IS SO ORDERED.**

Dated this 7<sup>th</sup> day of December, 2020.

  
JENNIFER A. DORSEY  
UNITED STATES DISTRICT JUDGE